

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Crim. Act. No. 99-80-JJF

JOHN E. TROTTER,

Defendant.


**MOTION FOR REVOCATION OF ORDER OF PRETRIAL RELEASE AND  
DETENTION PENDING REVOCATION OF SUPERVISED RELEASE HEARING**

NOW COMES the United States and files this written motion following the oral motion made in open court on February 6, 2007 and hereby moves for the revocation of the Court's January 4, 2007 order of pretrial release of the defendant, pursuant to 18 U.S.C. Section 3148(b), and further moves for detention of the defendant pending a hearing on the petition for revocation of supervised release, pursuant to Federal Rules of Criminal Procedure 32.1(a)(6) and 46(d). In support of the motion, the United States alleges as follows: (a) that there is probable cause to believe that the defendant has committed a federal, state or local crime while on release pursuant to the Court's order pending his revocation hearing; (b) that, based on the factors set forth in 18 U.S.C. Sec. 3142(g), there is no condition or combination of conditions of release that will assure that defendant will not flee or pose a danger to the safety of any other person or the community; and (c) that the defendant is unlikely to abide by any condition or combination of conditions of release.

Respectfully submitted,

COLM F. CONNOLLY  
United States Attorney

BY:

  
Shannon Thee Hanson  
Assistant United States Attorney

Dated: February 7, 2007

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN E. TROTTER,

Defendant.

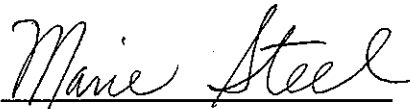
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Civil Action No. 99-80-JJF

**CERTIFICATE OF SERVICE**

I, Marie Steel, Legal Assistant in the Office of the United States Attorney for the District of Delaware, hereby certify that on the 7<sup>th</sup> day of February, 2007, I caused copies of the foregoing Motion For Revocation of Order of Pretrial Release and Detention Pending Revocation of Supervised Release Hearing to be served on the following counsel via First Class Mail:

Edson A. Bostic  
Assistant Federal Public Defender  
First Federal Plaza  
704 King Street, Suite 110  
Wilmington, DE 19801



Marie Steel  
Legal Assistant